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**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**BOSTON GAS COMPANY d/b/a KEYSPAN ENERGY  
DELIVERY NEW ENGLAND**

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D.T.E. 03-40

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**ATTORNEY GENERAL'S EIGHT SET OF  
DOCUMENT AND INFORMATION REQUESTS**

- AG-8-1      Please provide redlined copies of all tariffs the Company is proposing to revise.
- AG-8-2      Please provide a draft tariff for the implementation of the Company's proposed PBR.
- AG-8-3      Please provide copies of all Weather Normalization/Stabilization Clause tariffs currently in effect for any KeySpan company. Include copies of the orders approving and amending original tariffs. In addition, provide a brief description, including availability criteria, of each rate class which is covered by the tariffs.
- AG-8-4      Please provide copies of all witness testimony and exhibits filed before regulatory agencies in support of all KeySpan company proposed Weather Normalization/Stabilization Clause tariffs. For any Weather Normalization/Stabilization Clause tariffs not approved by regulatory agencies, please provide copies of such orders.
- AG-8-5      Please provide an illustration of how the proposed Weather Normalization Clause tariff would have operated during the test year based on actual weather conditions. Include class specific bill impact analyses and monthly billings, and bill determinants for each class. Provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-6      Provide an illustration of how the operation of the proposed Weather Normalization/Stabilization Clause would have affected the bills for customers on budget/levelized billing plans. Provide the number of budget/levelized billing plan customers and their actual monthly usage during the test year. Provide the

calculations in electronic spreadsheet form (Excel or Lotus compatible).

- AG-8-7 Please provide a copy of the fully allocated embedded cost of service studies filed in the Company's last rate case. If the Company filed compliance cost of service studies, include that as part of this response and explain the differences between the study originally filed and the compliance studies.
- AG-8-8 Please provide a comprehensive definitions of "core customers" and "non-core customers." Include copies of all contracts or other agreements with "non-core customers", all pricing terms for services provided to each "non-core customer", and the test year monthly revenues and bill determinants for each "non-core customer."
- AG-8-9 Refer to Exhibit KEDNE/AEL-5. Please identify each allocator that is different from the allocator used in the Company's fully allocated embedded cost of service study presented in the Company's last rate case. Include an explanation for each change.
- AG-8-10 Refer to Exhibit KEDNE/AEL-5. Please provide a table of allocators that lists the acronym, the accounts that are allocated using each allocator and all allocators that the mathematical equivalents.
- AG-8-11 For each allocator used by the Company in the embedded cost of service study provide the basis for its use. If the use is based on Department precedent, provide a citation to the orders supporting the Department's preference for the specific allocator. If the Company calculates a Department approved allocator differently than approved by the Department in the precedential case, please explain why the Company's calculation is different.
- AG-8-12 Please rerun the Company's cost of service studies with additional customer class or classes incorporating all of the Company's special contract customers. Provide all supporting calculations, workpapers and assumptions. The response should include the basis for the selection of allocators or direct cost assignments to the new class or classes. Provide the model in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-13 Please provide a "functionalized" cost of service study that is the equivalent of Exhibit KEDNE/AEL-5 with the costs related the functions of capacity/demand, energy and customer appearing in columns. Include all supporting workpapers, calculations, underlying data and assumptions. Provide the model in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-14 Please provide a copy of the marginal cost of service studies filed in the

Company's last rate case. If the Company filed compliance studies, include these as part of this response and explain the differences between the originally filed studies and the compliance studies.

- AG-8-15 Please explain any and all differences between the marginal cost studies presented in the Company's last rate case and the studies proposed in this filing.
- AG-8-16 Please provide monthly test year revenues, by customer class, for each rate element (customer charge, demand charge, head block, tail block, GAF, and LDAC). Provide the data in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-17 Please provide monthly test year billed quantities, by customer class, for each rate element (customer charge, demand charge, head block volumes, tail block volumes, GAF volumes, and LDAC volumes). Provide the data in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-18 For each contract customer for which the Company retained 100% of the revenues during the test year, please provide monthly test year *revenues* by rate element (customer/administrative charge, demand charge, volumetric charges by block, as appropriate, and other elements as appropriate). Provide the data in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-19 For each contract customer for which the Company retained 100% of the revenues during the test year, please provide monthly test year *billed quantities* by rate element (customer/administrative charge, demand charge, volumetric charges by block, as appropriate, and other elements as appropriate). Provide the data in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-20 For each contract customer for which the Company retained 100% of the revenues during the test year, please provide monthly test year revenue by rate element (customer/administrative charge, demand charge, volumetric charges by block, as appropriate, and other elements as appropriate) had each customer been served under the tariffed rate for which they were eligible. Provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-21 For each contract customer whose revenues were subject to margin sharing during the test year, please provide monthly test year *revenues* by rate element (customer/administrative charge, demand charge, volumetric charges by block, as appropriate, and other elements as appropriate). Provide the data in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-22 For each contract customer whose revenues were subject to margin sharing during

the test year, please provide monthly test year *billed quantities* by rate element (customer/administrative charge, demand charge, volumetric charges by block, as appropriate, and other elements as appropriate). Provide the data in electronic spreadsheet form (Excel or Lotus compatible).

- AG-8-23 For each contract customer whose revenues were subject to margin sharing during the test year, please provide monthly test year revenues by rate element (customer/administrative charge, demand charge, volumetric charges by block, as appropriate, and other elements as appropriate) had each customer been served under the tariffed rate for which they were eligible. Provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-24 For each contract customer *not* subject to margin sharing and whose margins were *not* retained by the Company during the test year please provide monthly test year *revenues* by rate element (customer/administrative charge, demand charge, volumetric charges by block, as appropriate, and other elements as appropriate). Provide the data in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-25 For each contract customer *not* subject to margin sharing and whose margins were *not* retained by the Company during the test year please provide monthly test year *billed quantities* by rate element (customer/administrative charge, demand charge, volumetric charges by block, as appropriate, and other elements as appropriate). Provide the data in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-26 For each contract customer *not* subject to margin sharing and whose margins were *not* retained by the Company during the test year please provide monthly test year revenues by rate element (customer/administrative charge, demand charge, volumetric charges by block, as appropriate, and other elements as appropriate) had each customer been served under the tariffed rate for which they were eligible. Provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-27 For each contract customer to whom the Company sold gas, please provide the monthly test year volumes and revenues. If any of the contract customers that purchased gas from the Company were not paying the CGA and LDAC, provide the monthly CGA and LDAC revenue that they would have paid if they had been served under tariffed rates. Include all supporting workpapers, documentation, calculations and assumptions. Provide the data and calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-28 For each of the Company's contract customers, provide copies of all contract amendments that became effective during the test year or after the end of the test year. For each contract amendment that affected pricing or contract quantities,

please provide the annual revenues and bill determinants for each rate element had the amendments been in effect for an entire year. Provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).

- AG-8-29 Refer to Exhibit KEDNE/AEL-1, p.4. Please provide the degree day data for the period January 1983 through December 2002 in an Excel or Lotus spreadsheet. Identify the source of the data by provider (who collected the data) and location (where temperatures were measured). If the Company calculated degree days from temperature data, provide the temperature data and the Company's workpapers and assumptions supporting its calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-30 Please provide, in electronic spreadsheet form (Excel or Lotus compatible), all the calculations supporting Exhibit KEDNE/AEL-2, pp. 2-5 (weather normalization adjustments).
- AG-8-31 Refer to Exhibit KEDNE/AEL-2, pp. 4-5. Please explain what 44 and 83, and 54 and 84 are. If they are separate customer classes, please explain why the Company did not perform the weather normalization calculations separately for each class.
- AG-8-32 Refer to Exhibit KEDNE/AEL-2, p. 2. Please explain how the Company calculated the weather normalized therms for Rates G-44 and G-54. Please provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-33 Refer to Exhibit KEDNE/AEL-2, p. 2. Please explain why there are no volumes for Rates G-61, G-62, G-63 & 64. If these were combined with other classes, please provide the weather normalization adjustments with these classes calculated on an individual basis. Please provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-34 Refer to Refer to Exhibit KEDNE/AEL-2, p. 3. Please explain why the Company did not adjust weather normalized billings by a billing day adjustment factor.
- AG-8-35 Why is the Company's billing day adjustment applied only winter usage and not average annual usage?
- AG-8-36 Why is the Company's billing day adjustment done using "average gross margin" and not on a class by class basis?
- AG-8-37 Refer to Exhibit KEDNE/AEL-2, p. 6. Please provide all calculations and

assumptions supporting the “average gross margin per MMBtu” figure of \$2.657. Please provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).

- AG-8-38 Refer to Exhibit KEDNE/AEL-2, p. 7. Please provide all calculations supporting this schedule in electronic spreadsheet form (Excel or Lotus compatible). Include the rates in place both before and after July 2002 for each customer class.
- AG-8-39 Refer to Exhibit KEDNE/AEL-2, p. 8. Please provide all supporting documentation, calculations and assumptions related to both the Exelon Mystic and Distrigas/Exelon contracts, including the pricing and any other contract terms related to the annual margins. If these contracts and amendments have not been provided in another response (provide reference), please provide copies of all related contracts and amendments.
- AG-8-40 Refer to Exhibit KEDNE/AEL-2, p. 9. Please provide all calculations supporting this schedule in electronic spreadsheet form (Excel or Lotus compatible). Include the details supporting the data appearing in each column of the exhibit for each customer class.
- AG-8-41 Please provide all calculations, supporting documents (including contracts and related amendments), workpapers and assumptions underlying the Weather Stabilization Adjustment. Include the accounting principles or rules that governed the way the Company booked the costs and revenues related to the Weather Stabilization arrangements. Provide the monthly bookings, including the account numbers affected, related to the Weather Stabilization arrangements. If the Company has entered into weather stabilization agreements post test year, please provide the contracts and the monthly revenues and expenses.
- AG-8-42 Please provide all calculations, supporting documents, workpapers and assumptions underlying the proposed PBR Revenue Adjustment. The response should include the monthly details by customer class of all rate changes and usage levels supporting the adjustment. Include the accounting principle or rules that governed the way the Company booked the revenues related to the PBR revenue adjustment. Provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-43 Please provide all calculations, supporting documents, workpapers and assumptions underlying the proposed DSM Incentive Adjustment. The response should include the monthly details by customer class supporting the adjustment. Provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).

- AG-8-44 Please provide all calculations, supporting documents, workpapers and assumptions underlying the proposed Energy Efficiency Revenue Adjustment. The response should include the monthly details by customer class supporting the adjustment. Provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-45 Please provide all calculations, supporting documents, workpapers and assumptions underlying the proposed Non-Firm Revenue Adjustment. The response should include monthly pricing and volume data for each non-firm customer. Identify each customer as either sales or transportation and provide the data separately for distribution revenues and gas sales revenues. Provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-46 Please provide all calculations, supporting documents, workpapers and assumptions underlying the proposed Broker Revenue Adjustment. The response should include the monthly details of the revenues and related costs. Please explain how these revenues are treated for ratemaking purposes. Are the broker revenues different than broker penalties? Explain any difference and how each is accounted for by the Company. Provide the calculations in electronic spreadsheet form (Excel or Lotus compatible).
- AG-8-47 Refer to Exhibit KEDNE/AEL-2. Please explain any differences between the revenue adjustment calculations proposed by the Company in this filing and those allowed by the Department in the Company's last rate case.
- AG-8-48 Provide the details of all other KeySpan companies' unbilled revenue adjustments that have been accepted by regulatory authorities. Explain the differences between the accepted practice of other KeySpan companies and the Company's proposal.
- AG-8-49 Provide the details of all other KeySpan companies' weather normalizing adjustment methodologies that have been accepted by regulatory authorities. Explain the differences between the accepted practice of other KeySpan companies and the Company's proposal.

April 25, 2003